

1 DARRYL M. WOO (CSB NO. 100513)
dwoo@fenwick.com
 2 CHARLENE M. MORROW (CSB NO. 136411)
cmorrow@fenwick.com
 3 PATRICK E. PREMO (CSB NO. 184915)
ppremo@fenwick.com
 4 BRYAN A. KOHM (CSB NO. 233276)
bkohm@fenwick.com
 5 FENWICK & WEST LLP
 555 California Street, 12th Floor
 6 San Francisco, CA 94104
 Telephone: (415) 875-2300
 7 Facsimile: (415) 281-1350

8 Attorneys for Defendants and Counterclaimants
 9 AMBU A/S, AMBU INC., and AMBU LTD.

10 UNITED STATES DISTRICT COURT
 11 SOUTHERN DISTRICT OF CALIFORNIA
 12

13 THE LARYNGEAL MASK COMPANY LTD.
 14 and LMA NORTH AMERICA, INC.,

15 Plaintiffs,

16 v.

17 AMBU A/S, AMBU INC., and AMBU LTD.,

18 Defendants,
 19

20 AND RELATED COUNTERCLAIMS.
 21

Case No. 3:07-cv-01988 DMS (NLS)

Jury Trial Demanded

**DEFENDANTS' APPLICATION FOR LEAVE TO
 FILE UNDER SEAL EXHIBITS A AND B TO THE
 DECLARATION OF DARRYL M. WOO IN
 SUPPORT OF DEFENDANTS' MOTION FOR
 RECONSIDERATION**

Date: September 15, 2009

Time: 2:00 p.m.

Courtroom: F, 1st Floor

The Honorable Nita L. Stormes

22 Pursuant to Civil L.R. 7.2 and 79.2.c, Defendants Ambu A/S, Ambu Inc. and Ambu Ltd.,
 23 (collectively "Ambu") hereby moves the Court for an Order permitting it to file under seal in this
 24 Court Exhibits A and B to the Declaration of Darryl M. Woo in Support of Defendants' Motion for
 25 Reconsideration of Order Granting Plaintiffs' Motion for Leave to Take Five Depositions Beyond
 26 the Presumptive Limit of F.R.C.P. 30(a)(2)(A)(i) ("Woo Declaration"), which contain information
 27 that has been designated by Ambu or LMA as highly confidential under the terms of the Protective
 28 Order entered by the Court on September 3, 2008 (Dkt. No. 74). The specific documents and

1 portions of documents at issue are as follows:

- 2 1. Exhibit A to the Woo Declaration; and
- 3 2. Exhibit B to the Woo Declaration.

4 Ambu respectfully requests that this Court grant its motion to file the above document
5 under seal in accordance with the Protective Order.

6 Dated: August 17, 2009

FENWICK & WEST LLP

7
8 By: /s/ *Darryl M. Woo*
9 Darryl M. Woo

10 Attorneys for Defendants and Counterclaimants,
11 AMBU A/S, AMBU INC., AND AMBU LTD.
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule 5.2 on August 17, 2009.

By: /s/ Darryl M. Woo

Darryl M. Woo

E-mail: dwoo@fenwick.com

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO